

W A S A T C H



Clean Air Coalition

December 22, 2001

Rick Sprott, Executive Secretary
Utah Air Quality Board
150 North 1950 West
Salt Lake City, UT 84114

**Re: Intermountain Power Service Corporation
ITA: MODIFICATION TO APPROVAL ORDER FOR INCREASED CAPACITY BY
MODIFYING UNITS 1 & 2 AND DEBOTTLENECKING
DAQE-955-01**

The Wasatch Clean Air Coalition welcomes the opportunity to comment on this Intent to Approve, and thanks the New Source Review Section for their efforts to make information about this permit available to us.

Early in the comment period, I formed the opinion that this modification was a minor matter of increasing efficiency of the turbines and would not result in increased emissions. Because of this opinion, I delayed careful attention to the materials available to me, and now at the end of the comment period discover some items that I wish I had pursued in a more timely fashion. Apologies to Milka Radulovic for not allowing adequate time for her to address my concerns in a less formal manner.

The previous Approval Order (AO) DAQE-749-01 and the current Intent to Approve (ITA) DAQE-955-01 each have summaries of the Potential To Emit (PTE) emissions for the Intermountain Power Service Corporation (IPSC) power generation plant calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr (e-749-01)</u>	<u>Tons/yr (e-955-01)</u>	<u>difference (%)</u>
i.	PM ₁₀	248.88	3,286.70	+ 1220 %
ii.	SO ₂	3,698.32	11,332.30	+ 206 %
iii.	NO _x	24,178.63	37,868.20	+ 57 %
iv.	CO	1,312.44	1,989.6	+52 %
v.	VOC	14.29	63.91	+347 %
vi.	HAPs	82.67	82.67	—

Item 4 in the **ABSTRACT** says

4. In addition to the requested changes, existing emissions from the existing cooling towers were added to the plant potential to emit.

It is apparent that some of the increase in PTE can be from the addition of existing emissions from the existing

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cooling towers, but the magnitude of the changes in emissions is remarkable .

The only limits to operation contained in the ITA are for fuel oil and a new limit on CO. The limit on CO in this ITA, 1989.6 tpy is 673 tpy and 51 % higher than the current actual emissions given, 1317.06 tpy. The predicted future emissions are much below the PTE, and there are not enforceable limits on the other pollutants. The determination that there is not a significant net emissions increase relieves the IPSC of the major modification requirements, Prevention of Significant Deterioration (PSD). It is not obvious how the proposed ITA will prevent a significant net emissions increase over the current actual emissions. If IPSC is to be relieved of PSD requirements, the citizens should have enforceable limits within the AO on operation at IPSC that assure that IPSC will be out of compliance with their AO if their emissions increase significantly after this modification.

Peace,

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cc: Mike Owens
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*orig -
Flexibility - /
No Limits Required*